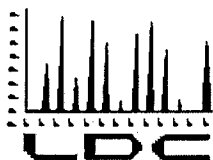


APPENDIX A

DATA VALIDATION REPORTS



LABORATORY DATA CONSULTANTS, INC.

2701 Loker Ave. West, Suite 220, Carlsbad, CA 92010 Bus: 760-827-1100 Fax: 760-827-1099

Anchor QEA, LLC
720 Olive Way, Suite 900
Seattle, WA 98101
ATTN: Ms. Cindy Fields

March 25, 2016

SUBJECT: Jorgensen Forge EAA, Data Validation

Dear Ms. Fields,

Enclosed is the final validation report for the fractions listed below. This SDG was received on March 18, 2016. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project #36049:

SDG #

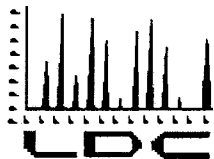
Fraction

AVZ9

Polychlorinated Biphenyls, Metals, Wet Chemistry

The data validation was performed under Stage 2B guidelines. The analyses were validated using the following documents, as applicable to each method:

- Attachment 1 of the Quality Assurance Project Plan, Addendum No. 2 to the Operations, Monitoring, and Maintenance Plan for Jorgensen Forge Early Action Area, September 2015
- USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review, June 2008
- USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Method Data Review, October 1999
- Quality Assurance Project Plan, Addendum No. 2 to the Operations, Monitoring, and Maintenance Plan for Jorgensen Forge Early Action Area, September 2015
- USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Superfund Data Review, October 2004
- EPA SW 846, Third Edition, Test Methods for Evaluating Solid Waste, update 1, July 1992; update IIA, August 1993; update II, September 1994; update IIB, January 1995; update III, December 1996; update IIIA, April 1998; IIIB, November 2004; Update IV, February 2007



Please feel free to contact us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Christina Rink". The signature is fluid and cursive, with a large initial "C" and "R".

Christina Rink
Project Manager/Chemist

EDD Stage 2B

LDC #36049 (Anchor Environmental-Seattle WA / Jorgensen Forge EAA)

[illegible]

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Jorgensen Forge Early Action Area

LDC Report Date: March 21, 2016

Parameters: Polychlorinated Biphenyls

Validation Level: Stage 2B

Laboratory: Analytical Resources, Inc.

Sample Delivery Group (SDG): AVZ9

| Sample Identification | Laboratory Sample Identification | Matrix | Collection Date |
|--------------------------|----------------------------------|----------|-----------------|
| JF-PDS-6-0-1ft-160209 | AVZ9A | Sediment | 02/09/16 |
| JF-PDS-6-1-2ft-160209 | AVZ9B | Sediment | 02/09/16 |
| JF-PDS-4-0-1ft-160210 | AVZ9C | Sediment | 02/10/16 |
| JF-PDS-4-1-2ft-160210 | AVZ9D | Sediment | 02/10/16 |
| JF-PDS-2-0-1ft-160210 | AVZ9E | Sediment | 02/10/16 |
| JF-PDS-2-1-2ft-160210 | AVZ9F | Sediment | 02/10/16 |
| JF-PDS-1-0-1ft-160210 | AVZ9G | Sediment | 02/10/16 |
| JF-PDS-1-1-2ft-160210 | AVZ9H | Sediment | 02/10/16 |
| JF-PDS-3-0-1ft-160211 | AVZ9I | Sediment | 02/11/16 |
| JF-PDS-3-1-2ft-160211 | AVZ9J | Sediment | 02/11/16 |
| JF-PDS-103-1-2ft-160211 | AVZ9K | Sediment | 02/11/16 |
| JF-PDS-5-0-1ft-160211 | AVZ9L | Sediment | 02/11/16 |
| JF-PDS-5-0-1ft-160211DL | AVZ9LDL | Sediment | 02/11/16 |
| JF-PDS-5-1-2ft-160211 | AVZ9M | Sediment | 02/11/16 |
| JF-PDS-105-0-1ft-160211 | AVZ9N | Sediment | 02/11/16 |
| JF-PDS-7-0-1ft-160212 | AVZ9O | Sediment | 02/12/16 |
| JF-PDS-7-1-2ft-160212 | AVZ9P | Sediment | 02/12/16 |
| JF-RB-160212 | AVZ9AQ | Water | 02/12/16 |
| JF-PDS-2-1-2ft-160210MS | AVZ9FMS | Sediment | 02/10/16 |
| JF-PDS-2-1-2ft-160210MSD | AVZ9FMSD | Sediment | 02/10/16 |

Introduction

This Data Validation Report (DVR) presents data validation findings and results for the associated samples listed on the cover page. Data validation was performed in accordance with Attachment 1 of the Quality Assurance Project Plan, Addendum No. 2 to the Operations, Monitoring, and Maintenance Plan for Jorgensen Forge Early Action Area (September 2015) and modified outlines of the USEPA Contract Laboratory Program National Functional Guidelines (CLPNFG) for Superfund Organic Methods Data Review (June 2008) and USEPA Contract Laboratory Program National Functional Guidelines (CLPNFG) for Superfund Organic Methods Data Review (October 1999). Where specific guidance was not available, the data has been evaluated in a conservative manner consistent with industry standards using professional experience.

The analyses were performed by the following method:

Polychlorinated Biphenyls (PCBs) by Environmental Protection Agency (EPA) SW 846 Method 8082A

All sample results were subjected to Stage 2B data validation, which comprises an evaluation of quality control (QC) summary results.

The following are definitions of the data qualifiers utilized during data validation:

- J (Estimated): The compound or analyte was analyzed for and positively identified by the laboratory; however the reported concentration is estimated due to non-conformances discovered during data validation.
- U (Non-detected): The compound or analyte was analyzed for and positively identified by the laboratory; however the compound or analyte should be considered non-detected at the reported concentration due to the presence of contaminants detected in the associated blank(s).
- UJ (Non-detected estimated): The compound or analyte was reported as not detected by the laboratory; however the reported quantitation/detection limit is estimated due to non-conformances discovered during data validation.
- R (Rejected): The sample results were rejected due to gross non-conformances discovered during data validation. Data qualified as rejected is not usable.
- NA (Not Applicable): The non-conformance discovered during data validation demonstrates a high bias, while the affected compound or analyte in the associated sample(s) was reported as not detected by the laboratory and did not warrant the qualification of the data.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

I. Sample Receipt and Technical Holding Times

All samples were received in good condition and cooler temperatures upon receipt met validation criteria.

All technical holding time requirements were met.

II. Initial Calibration and Initial Calibration Verification

An initial calibration was performed as required by the method.

The percent relative standard deviations (%RSD) were less than or equal to 20.0% for all compounds.

The percent differences (%D) of the initial calibration verification (ICV) standard were less than or equal to 20.0% for all compounds.

III. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) were less than or equal to 20.0% for all compounds.

IV. Laboratory Blanks

Laboratory blanks were analyzed as required by the method. No contaminants were found in the laboratory blanks.

V. Field Blanks

Sample JF-RB-160212 was identified as a rinsate blank. No contaminants were found with the following exceptions:

| Blank ID | Compound | Concentration (ug/L) |
|--------------|--|--------------------------|
| JF-RB-160212 | Aroclor-1248 Aroclor-1254 Aroclor-1260 | 0.014 0.033 0.0070 |

VI. Surrogates/Internal Standards

Surrogates were added to all samples as required by the method. Surrogate recoveries (%R) were not within QC limits for sample JF-PDS-5-0-1ft-160211DL. No data were qualified for samples analyzed at greater than or equal to 5X dilution.

All internal standard areas and retention times were within QC limits.

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) sample analysis was performed on an associated project sample. Percent recoveries (%R) were within QC limits. Relative percent differences (RPD) were within QC limits.

VIII. Laboratory Control Samples/Standard Reference Materials

Laboratory control samples (LCS) were analyzed as required by the method. Percent recoveries (%R) were within QC limits.

Standard reference materials (SRM) were analyzed as required by the method. The Aroclor-1260 result in the SRM was within the QC limits, however, the laboratory also reported Aroclor-1254.

IX. Field Duplicates

Samples JF-PDS-3-1-2ft-160211 and JF-PDS-103-1-2ft-160211 and samples JF-PDS-5-0-1ft-160211 and JF-PDS-105-0-1ft-160211 were identified as field duplicates. No results were detected in any of the samples with the following exceptions:

| Compound | Concentration (ug/Kg) | | RPD |
|--------------|-----------------------|-------------------------|-----|
| | JF-PDS-3-1-2ft-160211 | JF-PDS-103-1-2ft-160211 | |
| Aroclor-1260 | 2.5 | 2.9 | 15 |

| Compound | Concentration (ug/Kg) | | RPD |
|--------------|-------------------------|-------------------------|-----|
| | JF-PDS-5-0-1ft-160211DL | JF-PDS-105-0-1ft-160211 | |
| Aroclor-1248 | 700 | 570U | 200 |
| Aroclor-1254 | 1600 | 2200 | 32 |
| Aroclor-1260 | 530 | 550 | 4 |

X. Compound Quantitation

All compound quantitations met validation criteria with the following exceptions:

| Sample | Compound | Finding | Criteria | Flag | A or P |
|-----------------------|--|---|---|---|--------|
| JF-PDS-5-0-1ft-160211 | Aroclor-1248 Aroclor-1254 Aroclor-1260 | Sample result exceeded calibration range. | Reported result should be within calibration range. | J (all detects) J (all detects) J (all detects) | A |

Raw data were not reviewed for Stage 2B validation.

XI. Target Compound Identification

Raw data were not reviewed for Stage 2B validation.

XII. Overall Assessment of Data

The analysis was conducted within all specifications of the method.

In the case where more than one result was reported for an individual sample, the least technically acceptable results were deemed unusable as follows:

| Sample | Compound | Flag | A or P |
|-------------------------|--|-------------|--------|
| JF-PDS-5-0-1ft-160211 | Aroclor-1248 Aroclor-1254 Aroclor-1260 | R R R | A |
| JF-PDS-5-0-1ft-160211DL | All TCL compounds except Aroclor-1248 Aroclor-1254 Aroclor-1260 | R | A |

The quality control criteria reviewed, other than those discussed above, were met and are considered acceptable. Sample results that were found to be rejected (R) are unusable for all purposes. Based upon the data validation all other results are considered valid and usable for all purposes.

**Jorgensen Forge Early Action Area
Polychlorinated Biphenyls - Data Qualification Summary - SDG AVZ9**

| Sample | Compound | Flag | A or P | Reason |
|-------------------------|--|-------------|--------|----------------------------|
| JF-PDS-5-0-1ft-160211 | Aroclor-1248 Aroclor-1254 Aroclor-1260 | R R R | A | Overall assessment of data |
| JF-PDS-5-0-1ft-160211DL | All TCL compounds except Aroclor-1248 Aroclor-1254 Aroclor-1260 | R | A | Overall assessment of data |

**Jorgensen Forge Early Action Area
Polychlorinated Biphenyls - Laboratory Blank Data Qualification Summary - SDG
AVZ9**

No Sample Data Qualified in this SDG

LDC #: 36049A3b

VALIDATION COMPLETENESS WORKSHEET

SDG #: AVZ9

Stage 2B

Laboratory: Analytical Resources, Inc.

Date: 3/21/16

Page: 1 of 2

Reviewer: EF2nd Reviewer: EF**METHOD:** GC Polychlorinated Biphenyls (EPA SW846 Method 8082A)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

| | Validation Area | | Comments |
|-------|--|-------|--------------------------|
| I. | Sample receipt/Technical holding times | A / A | |
| II. | Initial calibration/ICV | A / A | % PSD / ICV ≤ 20 |
| III. | Continuing calibration | A | CCV ≤ 20 |
| IV. | Laboratory Blanks | A | |
| V. | Field blanks | SW | RB = 18 |
| VI. | Surrogate spikes 1/9 | SW/A | |
| VII. | Matrix spike/Matrix spike duplicates | A | |
| VIII. | Laboratory control samples 1/SRM | A/SW | LES, SRM |
| IX. | Field duplicates | SW | D = 10, 11 12, 15 13, 15 |
| X. | Compound quantitation/RL/LOQ/LODs | SW | |
| XI. | Target compound identification | N | |
| XII. | Overall assessment of data | SW | |

Note: A = Acceptable
N = Not provided/applicable
SW = See worksheet

ND = No compounds detected
R = Rinsate
FB = Field blank

D = Duplicate
TB = Trip blank
EB = Equipment blank

SB = Source blank
OTHER:

| | Client ID | Lab ID | Matrix | Date |
|----|--|---------|----------|----------|
| 1 | JF-PDS-6-0-1ft-160209 | AVZ9A | Sediment | 02/09/16 |
| 2 | JF-PDS-6-1-2ft-160209 | AVZ9B | Sediment | 02/09/16 |
| 3 | JF-PDS-4-0-1ft-160210 | AVZ9C | Sediment | 02/10/16 |
| 4 | JF-PDS-4-1-2ft-160210 | AVZ9D | Sediment | 02/10/16 |
| 5 | JF-PDS-2-0-1ft-160210 | AVZ9E | Sediment | 02/10/16 |
| 6 | JF-PDS-2-1-2ft-160210 | AVZ9F | Sediment | 02/10/16 |
| 7 | JF-PDS-1-0-1ft-160210 | AVZ9G | Sediment | 02/10/16 |
| 8 | JF-PDS-1-1-2ft-160210 | AVZ9H | Sediment | 02/10/16 |
| 9 | JF-PDS-3-0-1ft-160211 | AVZ9I | Sediment | 02/11/16 |
| 10 | JF-PDS-3-1-2ft-160211 D | AVZ9J | Sediment | 02/11/16 |
| 11 | JF-PDS-103-1-2ft-160211 D | AVZ9K | Sediment | 02/11/16 |
| 12 | JF-PDS-5-0-1ft-160211 D ₁ | AVZ9L | Sediment | 02/11/16 |
| 13 | JF-PDS-5-0-1ft-160211DL D ₁ | AVZ9LDL | Sediment | 02/11/16 |
| 14 | JF-PDS-5-1-2ft-160211 D ₁ | AVZ9M | Sediment | 02/11/16 |
| 15 | JF-PDS-105-0-1ft-160211 D ₁ | AVZ9N | Sediment | 02/11/16 |
| 16 | JF-PDS-7-0-1ft-160212 | AVZ9O | Sediment | 02/12/16 |
| 17 | JF-PDS-7-1-2ft-160212 | AVZ9P | Sediment | 02/12/16 |

LDC #: 36049A3b

VALIDATION COMPLETENESS WORKSHEET

SDG #: AVZ9

Stage 2B

Laboratory: Analytical Resources, Inc.

Date: 3/21/16

Page: 2 of 2

Reviewer: PT

2nd Reviewer: CR

METHOD: GC Polychlorinated Biphenyls (EPA SW846 Method 8082A)

| | Client ID | Lab ID | Matrix | Date |
|----|--------------------------|----------|----------|----------|
| 18 | JF-RB-160212 | AVZ9AQ | Water | 02/12/16 |
| 19 | JF-PDS-2-1-2ft-160210MS | AVZ9FMS | Sediment | 02/10/16 |
| 20 | JF-PDS-2-1-2ft-160210MSD | AVZ9FMSD | Sediment | 02/10/16 |
| 21 | | | | |
| 22 | | | | |
| 23 | | | | |
| 24 | | | | |
| 25 | | | | |

Notes:

| | | | | | | |
|---------------|--|--|--|--|--|--|
| - MB - 021716 | | | | | | |
| - MB - 021916 | | | | | | |
| | | | | | | |
| | | | | | | |

VALIDATION FINDINGS WORKSHEET

METHOD: Pesticide/PCBs (EPA SW 846 Method 8081/8082)

| | | | | |
|-----------------------|-----------------------|--------------------|-----------------------|---------------------------|
| A. alpha-BHC | I. Dieldrin | Q. Endrin ketone | Y. Aroclor-1242 | GG. Chlordane |
| B. beta-BHC | J. 4,4'-DDE | R. Endrin aldehyde | Z. Aroclor-1248 | HH. Chlordane (Technical) |
| C. delta-BHC | K. Endrin | S. alpha-Chlordane | AA. Aroclor-1254 | II. Aroclor 1262 |
| D. gamma-BHC | L. Endosulfan II | T. gamma-Chlordane | BB. Aroclor-1260 | JJ. Aroclor 1268 |
| E. Heptachlor | M. 4,4'-DDD | U. Toxaphene | CC. 2,4'-DDD | KK. Oxychlordane |
| F. Aldrin | N. Endosulfan sulfate | V. Aroclor-1016 | DD. 2,4'-DDE | LL. trans-Nonachlor |
| G. Heptachlor epoxide | O. 4,4'-DDT | W. Aroclor-1221 | EE. 2,4'-DDT | MM. cis-Nonachlor |
| H. Endosulfan I | P. Methoxychlor | X. Aroclor-1232 | FF. Hexachlorobenzene | NN. |

Notes: _____

LDC #: 36049A3bVALIDATION FINDINGS WORKSHEET
Field BlanksPage: 1 of 1
Reviewer: FT
2nd reviewer: alMETHOD: GC HPLCY N N/A
Y N N/A

Were field blanks identified in this SDG?

Were target compounds detected in the field blanks?

| (Circle One) Field Blank / Trip Blank / Atmospheric Blank / Ambient Blank Sample: <u>18</u> <u>Blank</u> Rinsate / Equipment Rinsate / Equipment Blank / Source Blank / Other _____ | | (Circle One) Field Blank / Trip Blank / Atmospheric Blank / Ambient Blank Sample: _____ Rinsate / Equipment Rinsate / Equipment Blank / Source Blank / Other _____ | |
|--|-------------------------------|---|-------------------------|
| Compound | Concentration (<u>ug/L</u>) | Compound | Concentration () |
| <u>Z</u> | <u>0.014</u> | | |
| <u>AA</u> | <u>0.033</u> | | |
| <u>BB</u> | <u>0.0070</u> | | |
| | | | |
| | | | |
| | | | |

| (Circle One) Field Blank / Trip Blank / Atmospheric Blank / Ambient Blank Sample: _____ Rinsate / Equipment Rinsate / Equipment Blank / Source Blank / Other _____ | | (Circle One) Field Blank / Trip Blank / Atmospheric Blank / Ambient Blank Sample: _____ Rinsate / Equipment Rinsate / Equipment Blank / Source Blank / Other _____ | |
|---|-------------------------|---|-------------------------|
| Compound | Concentration () | Compound | Concentration () |
| | | | |
| | | | |
| | | | |
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| | | | |
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LDC #: 3604943b

VALIDATION FINDINGS WORKSHEET

Surrogate Recovery

Page: 1 of 1

Reviewer: FT

2nd Reviewer: 02

METHOD: ☒ GC ☐ HPLC

Are surrogates required by the method? Yes____ or No____.

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

Y/N N/A Were surrogates spiked into all samples and blanks?

| Y/N | N/A | Did all surrogate recoveries (%R) meet the QC limits? |
|-----|-----|---|
| | | |

[illegible]

| | Surrogate Compound | | Surrogate Compound | | Surrogate Compound | | Surrogate Compound | | |
|---|----------------------------|---|---------------------|---|-----------------------------------|---|-------------------------|----|-------------------------------|
| A | Chlorobenzene (CBZ) | G | Octacosane | M | Benzo(e)Pyrene | S | 1-Chloro-3-Nitrobenzene | Y | Tetrachloro-m- xylene |
| B | 4-Bromofluorobenzene (BFB) | H | Ortho-Terphenyl | N | Terphenyl-D14 | T | 3,4-Dinitrotoluene | Z | 2-Bromonaphthalene |
| C | a,a,a-Trifluorotoluene | I | Fluorobenzene (FBZ) | O | Decachlorobiphenyl (DCB) | U | Triphenyltin | AA | Chloro-octadecane |
| D | Bromochlorobenene | J | n-Triacontane | P | 1-methylnaphthalene | V | Tri-n-propyltin | BB | 2,4-Dichlorophenylacetic acid |
| E | 1,4-Dichlorobutane | K | Hexacosane | Q | Dichlorophenyl Acetic Acid (DCAA) | W | Tributyl Phosphate | CC | 2,5-Dibromotoluene |
| F | 1,4-Difluorobenzene (DFB) | L | Bromobenzene | R | 4-Nitrophenol | X | Triphenyl Phosphate | | |

LDC #: 36049A3h

VALIDATION FINDINGS WORKSHEET

SRM

Page: of

Reviewer: FT

2nd Reviewer: CL

METHOD: GC HPLC

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

Y N N/A

Was SRM analyzed for each matrix in this SDG?

(Y N N/A)

Was the SRM recoveries within the limits?

[illegible]

LDC #: 36049A3bVALIDATION FINDINGS WORKSHEET
Field DuplicatesPage: 1 of 1Reviewer: FT2nd reviewer: OLMETHOD: ☒ GC ☐ HPLC☒ Y ☐ N ☐ N/A Were field duplicate pairs identified in this SDG?☒ Y ☐ N ☐ N/A Were target compounds detected in the field duplicate pairs?

| Compound | Concentration (<u>ug/kg</u>) | | %RPD Limit (<u>≤</u> <u> </u> %) | Qualification (Parent only) |
|-----------|--------------------------------|------------|---|--------------------------------|
| | <u>10</u> | <u>11</u> | | |
| <u>BB</u> | <u>2.5</u> | <u>2.9</u> | <u>15</u> | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

| Compound | Concentration (<u>ug/kg</u>) | | %RPD Limit (<u>≤</u> <u> </u> %) | Qualification (Parent only) |
|-----------|--------------------------------|-------------|---|--------------------------------|
| | <u>12</u> | <u>15</u> | | |
| <u>Z</u> | <u>540</u> | <u>5704</u> | <u>200</u> | |
| <u>AA</u> | <u>1400</u> | <u>2200</u> | <u>44</u> | |
| <u>BB</u> | <u>590</u> | <u>550</u> | <u>7</u> | |
| | | | | |
| | | | | |

| Compound | Concentration (<u>ug/kg</u>) | | %RPD Limit (<u>≤</u> <u> </u> %) | Qualification (Parent only) |
|-----------|--------------------------------|-------------|---|--------------------------------|
| | <u>13</u> | <u>15</u> | | |
| <u>Z</u> | <u>700</u> | <u>5704</u> | <u>200</u> | |
| <u>AA</u> | <u>1600</u> | <u>2200</u> | <u>32</u> | |
| <u>BB</u> | <u>530</u> | <u>550</u> | <u>4</u> | |
| | | | | |
| | | | | |

LDC #: 36049A3h

VALIDATION FINDINGS WORKSHEET

Compound Quantitation and Reported CRQLs

Page: 1 of 1
Reviewer: FT
2nd Reviewer: Q

METHOD: ✓ GC HPLC

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

Level IV/D₁ Only

Y N N/A Were CRQLs adjusted for sample dilutions, dry weight factors, etc.?

| | | | |
|---|---|-----|--|
| Y | N | N/A | Did the reported results for detected target compounds agree within 10.0% of the recalculated results? |
|---|---|-----|--|

[illegible]

Comments: See sample calculation verification worksheet for recalculations

LDC #: 36049A3bVALIDATION FINDINGS WORKSHEET
Overall Assessment of DataPage: 1 of 1Reviewer: FT2nd Reviewer: caMETHOD: ☒ GC ☐ HPLC

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

All available information pertaining to the data were reviewed using professional judgement to compliment the determination of the overall quality of the data.

☒ Y ☐ N N/A Was the overall quality and usability of the data acceptable?

| # | Associated samples | Compounds | Findings | Qualifications |
|----|--------------------|------------------|---------------|----------------|
| 12 | | Z, AA, BB | x'd cal Range | R/A |
| 13 | | all except above | diluted | R/A |
| | | | | |
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Comments: _____

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Jorgensen Forge Early Action Area

LDC Report Date: March 22, 2016

Parameters: Metals

Validation Level: Stage 2B

Laboratory: Analytical Resources, Inc.

Sample Delivery Group (SDG): AVZ9

| Sample Identification | Laboratory Sample Identification | Matrix | Collection Date |
|--------------------------|----------------------------------|----------|-----------------|
| JF-PDS-6-0-1ft-160209 | AVZ9A | Sediment | 02/09/16 |
| JF-PDS-6-1-2ft-160209 | AVZ9B | Sediment | 02/09/16 |
| JF-PDS-4-0-1ft-160210 | AVZ9C | Sediment | 02/10/16 |
| JF-PDS-4-1-2ft-160210 | AVZ9D | Sediment | 02/10/16 |
| JF-PDS-2-0-1ft-160210 | AVZ9E | Sediment | 02/10/16 |
| JF-PDS-2-1-2ft-160210 | AVZ9F | Sediment | 02/10/16 |
| JF-PDS-1-0-1ft-160210 | AVZ9G | Sediment | 02/10/16 |
| JF-PDS-1-1-2ft-160210 | AVZ9H | Sediment | 02/10/16 |
| JF-PDS-3-0-1ft-160211 | AVZ9I | Sediment | 02/11/16 |
| JF-PDS-3-1-2ft-160211 | AVZ9J | Sediment | 02/11/16 |
| JF-PDS-103-1-2ft-160211 | AVZ9K | Sediment | 02/11/16 |
| JF-PDS-5-0-1ft-160211 | AVZ9L | Sediment | 02/11/16 |
| JF-PDS-5-1-2ft-160211 | AVZ9M | Sediment | 02/11/16 |
| JF-PDS-105-0-1ft-160211 | AVZ9N | Sediment | 02/11/16 |
| JF-PDS-7-0-1ft-160212 | AVZ9O | Sediment | 02/12/16 |
| JF-PDS-7-1-2ft-160212 | AVZ9P | Sediment | 02/12/16 |
| JF-RB-160212 | AVZ9AQ | Water | 02/12/16 |
| JF-PDS-6-0-1ft-160209MS | AVZ9AMS | Sediment | 02/09/16 |
| JF-PDS-6-0-1ft-160209DUP | AVZ9ADUP | Sediment | 02/09/16 |
| JF-RB-160212MS | AVZ9AQMS | Water | 02/12/16 |
| JF-RB-160212DUP | AVZ9AQDUP | Water | 02/12/16 |

Introduction

This Data Validation Report (DVR) presents data validation findings and results for the associated samples listed on the cover page. Data validation was performed in accordance with Attachment 1 of the Quality Assurance Project Plan, Addendum No. 2 to the Operations, Monitoring, and Maintenance Plan for Jorgensen Forge Early Action Area (September 2015) and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines (CLPNFG) for Inorganic Superfund Data Review (October 2004). Where specific guidance was not available, the data has been evaluated in a conservative manner consistent with industry standards using professional experience.

The analyses were performed by the following methods:

Arsenic, Cadmium, Chromium, Copper, Lead, Silver, and Zinc by Environmental Protection Agency (EPA) SW 846 Method 6020A
Mercury by EPA SW 846 Methods 7470A/7471A

All sample results were subjected to Stage 2B data validation, which comprises an evaluation of quality control (QC) summary results.

The following are definitions of the data qualifiers utilized during data validation:

- J (Estimated): The compound or analyte was analyzed for and positively identified by the laboratory; however the reported concentration is estimated due to non-conformances discovered during data validation.
- U (Non-detected): The compound or analyte was analyzed for and positively identified by the laboratory; however the compound or analyte should be considered non-detected at the reported concentration due to the presence of contaminants detected in the associated blank(s).
- UJ (Non-detected estimated): The compound or analyte was reported as not detected by the laboratory; however the reported quantitation/detection limit is estimated due to non-conformances discovered during data validation.
- R (Rejected): The sample results were rejected due to gross non-conformances discovered during data validation. Data qualified as rejected is not usable.
- NA (Not Applicable): The non-conformance discovered during data validation demonstrates a high bias, while the affected compound or analyte in the associated sample(s) was reported as not detected by the laboratory and did not warrant the qualification of the data.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

I. Sample Receipt and Technical Holding Times

All samples were received in good condition.

All technical holding time requirements were met.

II. ICPMS Tune

The mass calibration was within 0.1 AMU and the percent relative standard deviation (%RSD) was less than or equal to 5%.

III. Instrument Calibration

Initial and continuing calibrations were performed as required by the methods.

The initial calibration verification (ICV) and continuing calibration verification (CCV) standards were within QC limits.

IV. ICP Interference Check Sample Analysis

The frequency of interference check sample (ICS) analysis was met. All criteria were within QC limits.

V. Laboratory Blanks

Laboratory blanks were analyzed as required by the methods. No contaminants were found in the laboratory blanks with the following exceptions:

| Blank ID | Analyte | Maximum Concentration | Associated Samples |
|-----------------|---|--|----------------------------------|
| PB (prep blank) | Chromium | 0.04 mg/Kg | All sediment samples in SDG AVZ9 |
| PB (prep blank) | Chromium Copper Lead Mercury Silver | 0.00011 mg/L 0.000400 mg/L 0.000010 mg/L 0.000010 mg/L 0.000010 mg/L | All water samples in SDG AVZ9 |

Data qualification by the laboratory blanks was based on the maximum contaminant concentration in the laboratory blanks in the analysis of each analyte. The sample concentrations were either not detected or were significantly greater (>5X blank contaminants) than the concentrations found in the associated laboratory blanks with the following exceptions:

| Sample | Analyte | Reported Concentration | Modified Final Concentration |
|--------------|--------------------|-----------------------------|-------------------------------|
| JF-RB-160212 | Chromium Copper | 0.00041 mg/L 0.0006 mg/L | 0.00041U mg/L 0.0006U mg/L |

VI. Field Blanks

Sample JF-RB-160212 was identified as a rinsate blank. No contaminants were found with the following exceptions:

| Blank ID | Analyte | Concentration (mg/L) |
|--------------|---|---|
| JF-RB-160212 | Arsenic Chromium Copper Lead Zinc | 0.00004 0.00041 0.0006 0.0001 0.006 |

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) sample analysis was performed on an associated project sample. Percent recoveries (%R) were within QC limits.

VIII. Duplicate Sample Analysis

Duplicate (DUP) sample analysis was performed on an associated project sample. Results were within QC limits.

IX. Serial Dilution

Serial dilution was not performed for this SDG.

X. Laboratory Control Samples

Laboratory control samples (LCS) were analyzed as required by the methods. Percent recoveries (%R) were within QC limits.

XI. Field Duplicates

Samples JF-PDS-3-1-2ft-160211 and JF-PDS-103-1-2ft-160211 and samples JF-PDS-5-0-1ft-160211 and JF-PDS-105-0-1ft-160211 were identified as field duplicates. No results were detected in any of the samples with the following exceptions:

| Analyte | Concentration (mg/Kg) | | RPD |
|----------|-----------------------|-------------------------|-----|
| | JF-PDS-3-1-2ft-160211 | JF-PDS-103-1-2ft-160211 | |
| Arsenic | 2.6 | 2.5 | 4 |
| Cadmium | 0.0489 | 0.0361 | 30 |
| Chromium | 11.5 | 9.0 | 24 |
| Copper | 11.2 | 9.9 | 12 |
| Lead | 2.26 | 1.86 | 19 |
| Mercury | 0.01 | 0.01 | 0 |
| Silver | 0.043 | 0.036 | 18 |
| Zinc | 25 | 24 | 4 |

| Analyte | Concentration (mg/Kg) | | RPD |
|----------|-----------------------|-------------------------|-----|
| | JF-PDS-5-0-1ft-160211 | JF-PDS-105-0-1ft-160211 | |
| Arsenic | 9.3 | 10.2 | 9 |
| Cadmium | 0.50 | 0.51 | 2 |
| Chromium | 34.3 | 35.0 | 2 |
| Copper | 39.0 | 41.5 | 6 |
| Lead | 345 | 323 | 7 |
| Mercury | 0.08 | 0.07 | 13 |
| Silver | 0.6 | 0.6 | 0 |
| Zinc | 160 | 171 | 7 |

XII. Internal Standards (ICP-MS)

Internal standards data were not reviewed for Stage 2B validation.

XIII. Sample Result Verification

Raw data were not reviewed for Stage 2B validation.

XIV. Overall Assessment of Data

The analysis was conducted within all specifications of the methods. No results were rejected in this SDG.

Due to laboratory blank contamination, data were qualified as not detected in one sample.

The quality control criteria reviewed, other than those discussed above, were met and are considered acceptable. Based upon the data validation all other results are considered valid and usable for all purposes.

**Jorgensen Forge Early Action Area
Metals - Data Qualification Summary - SDG AVZ9**

No Sample Data Qualified in this SDG

**Jorgensen Forge Early Action Area
Metals - Laboratory Blank Data Qualification Summary - SDG AVZ9**

| Sample | Analyte | Modified Final Concentration | A or P |
|--------------|--------------------|---------------------------------|--------|
| JF-RB-160212 | Chromium Copper | 0.00041U mg/L 0.0006U mg/L | A |

LDC #: 36049A4a

VALIDATION COMPLETENESS WORKSHEET

Date: 3-22-16

SDG #: AVZ9

Stage 2B

Page: 1 of 2

Laboratory: Analytical Resources, Inc.

Reviewer: MG

2nd Reviewer: *al***METHOD:** Metals (EPA SW 846 Method 6020A/7471A) / 7470A

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

| | Validation Area | | Comments |
|-------|--|----|---------------------------|
| I. | Sample receipt/Technical holding times | A | |
| II. | ICP/MS Tune | A | |
| III. | Instrument Calibration | A | |
| IV. | ICP Interference Check Sample (ICS) Analysis | A | |
| V. | Laboratory Blanks | SW | |
| VI. | Field Blanks | SW | RB = 17 |
| VII. | Matrix Spike/Matrix Spike Duplicates | A | MS |
| VIII. | Duplicate sample analysis | A | DUP |
| IX. | Serial Dilution | N | not performed |
| X. | Laboratory control samples | A | LCS |
| XI. | Field Duplicates | SW | D = 10 + 11, D = 12 + 14 |
| XII. | Internal Standard (ICP-MS) | N | not reviewed for Stage 2B |
| XIII. | Sample Result Verification | N | |
| XIV. | Overall Assessment of Data | A | |

Note: A = Acceptable
N = Not provided/applicable
SW = See worksheet

ND = No compounds detected
R = Rinsate
FB = Field blank

D = Duplicate
TB = Trip blank
EB = Equipment blank

SB = Source blank
OTHER:

| | Client ID | Lab ID | Matrix | Date |
|----|-------------------------|--------|----------|----------|
| 1 | JF-PDS-6-0-1ft-160209 | AVZ9A | Sediment | 02/09/16 |
| 2 | JF-PDS-6-1-2ft-160209 | AVZ9B | Sediment | 02/09/16 |
| 3 | JF-PDS-4-0-1ft-160210 | AVZ9C | Sediment | 02/10/16 |
| 4 | JF-PDS-4-1-2ft-160210 | AVZ9D | Sediment | 02/10/16 |
| 5 | JF-PDS-2-0-1ft-160210 | AVZ9E | Sediment | 02/10/16 |
| 6 | JF-PDS-2-1-2ft-160210 | AVZ9F | Sediment | 02/10/16 |
| 7 | JF-PDS-1-0-1ft-160210 | AVZ9G | Sediment | 02/10/16 |
| 8 | JF-PDS-1-1-2ft-160210 | AVZ9H | Sediment | 02/10/16 |
| 9 | JF-PDS-3-0-1ft-160211 | AVZ9I | Sediment | 02/11/16 |
| 10 | JF-PDS-3-1-2ft-160211 | AVZ9J | Sediment | 02/11/16 |
| 11 | JF-PDS-103-1-2ft-160211 | AVZ9K | Sediment | 02/11/16 |
| 12 | JF-PDS-5-0-1ft-160211 | AVZ9L | Sediment | 02/11/16 |
| 13 | JF-PDS-5-1-2ft-160211 | AVZ9M | Sediment | 02/11/16 |
| 14 | JF-PDS-105-0-1ft-160211 | AVZ9N | Sediment | 02/11/16 |
| 15 | JF-PDS-7-0-1ft-160212 | AVZ9O | Sediment | 02/12/16 |

LDC #: 36049A4a

VALIDATION COMPLETENESS WORKSHEET

SDG #: AVZ9

Stage 2B

Laboratory: Analytical Resources, Inc.

Date: 3-22-16

Page: 2 of 2

Reviewer: MG

2nd Reviewer: **METHOD:** Metals (EPA SW 846 Method 6020A/7471A)

| | Client ID | Lab ID | Matrix | Date |
|----|----------------------------|-----------|----------|----------|
| 16 | 1 JF-PDS-7-1-2ft-160212 | AVZ9P | Sediment | 02/12/16 |
| 17 | 2 JF-RB-160212 | AVZ9AQ | Water | 02/12/16 |
| 18 | 1 JF-PDS-6-0-1ft-160209MS | AVZ9AMS | Sediment | 02/09/16 |
| 19 | 1 JF-PDS-6-0-1ft-160209DUP | AVZ9ADUP | Sediment | 02/09/16 |
| 20 | 2 JF-RB-160212MS | AVZ9AQMS | Water | 02/12/16 |
| 21 | 2 JF-RB-160212DUP | AVZ9AQDUP | Water | 02/12/16 |
| 22 | | | | |
| 23 | | | | |
| 24 | | | | |
| 25 | 1 PBS | | | |
| 26 | 2 PBW | | | |

Notes: _____

LDC #: 36049A4a

VALIDATION FINDINGS WORKSHEET

Sample Specific Element Reference

Page: 1 of 1

Reviewer: MG

2nd reviewer:

All circled elements are applicable to each sample.

[illegible]

Comments: Mercury by CVAA if performed

LDC #: 36049A4a

SDG #: See Cover

METHOD: Trace metals (EPA SW 864 Method 6010B/6020/7000)

Sample Concentration units, unless otherwise noted: mg/kg

VALIDATION FINDINGS WORKSHEET

PB/ICB/CCB QUALIFIED SAMPLES

Soil preparation factor applied: 25x

Associated Samples: all sediment (>5x)

Page: 1 of 1

Reviewer: MG

2nd Reviewer: 9

| Analyte | Maximum PB ^a (mg/Kg) | Maximum PB ^a (ug/L) | Maximum ICB/CCB ^a (ug/L) | Action Limit | No Qual's. | | | | | | | | | | |
|---------|---------------------------------|--------------------------------|-------------------------------------|--------------|------------|--|--|--|--|--|--|--|--|--|--|
| Cr | 0.04 | | | 0.20 | | | | | | | | | | | |

Sample Concentration units, unless otherwise noted: mg/L

Associated Samples: all water

| Analyte | Maximum PB ^a (mg/Kg) | Maximum PB ^a (mg/L) | Maximum ICB/CCB ^a (ug/L) | Action Limit | 17 | | | | | | | | | | |
|---------|---------------------------------|--------------------------------|-------------------------------------|--------------|---------|--|--|--|--|--|--|--|--|--|--|
| Cr | | 0.00011 | | 0.00055 | 0.00041 | | | | | | | | | | |
| Cu | | 0.000400 | | 0.00200 | 0.0006 | | | | | | | | | | |
| Pb | | 0.000010 | | 0.000050 | | | | | | | | | | | |
| Hg | | 0.000010 | | 0.000050 | | | | | | | | | | | |
| Ag | | 0.000010 | | 0.000050 | | | | | | | | | | | |

Samples with analyte concentrations within five times the associated ICB, CCB or PB concentration are listed above with the identifications from the Validation Completeness Worksheet. These sample results were qualified as not detected, "U".

Note : a - The listed analyte concentration is the highest ICB, CCB, or PB detected in the analysis of each element.

LDC #: 36049A4a**VALIDATION FINDINGS WORKSHEET**
Field BlanksPage: 1 of 1Reviewer: MG2nd reviewer: ca**METHOD:** Trace Metals (EPA SW 846 Method 6010/6020/7000)☒ N N/A

Were field blanks identified in this SDG?

☒ N N/A

Were target analytes detected in the field blanks?


Sample: 17 Field Blank / Trip Blank / Rinsate / Other RB (circle one)

| Analyte | Concentration Units () |
|---------|----------------------------|
| As | 0.00004 (mg/L) |
| Cr | 0.00041 () |
| Cu | 0.00006 () |
| Pb | 0.00001 () |
| Zn | 0.0006 () |
| | |
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| | |

Sample: _____ Field Blank / Trip Blank / Rinsate / Other _____ (circle one)

| Analyte | Concentration Units () |
|---------|----------------------------|
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LDC#: 36049A4a

VALIDATION FINDINGS WORKSHEET
Field DuplicatesPage: 1 of 1
Reviewer: MG
2nd Reviewer: **METHOD:** Metals (EPA Method 6020A/7470A/7471A)

| Analyte | Concentration (mg/Kg) | | RPD | |
|----------|-----------------------|--------|-----|--|
| | 10 | 11 | | |
| Arsenic | 2.6 | 2.5 | 4 | |
| Cadmium | 0.0489 | 0.0361 | 30 | |
| Chromium | 11.5 | 9.0 | 24 | |
| Copper | 11.2 | 9.9 | 12 | |
| Lead | 2.26 | 1.86 | 19 | |
| Mercury | 0.01 | 0.01 | 0 | |
| Silver | 0.043 | 0.036 | 18 | |
| Zinc | 25 | 24 | 4 | |

V:\FIELD DUPLICATES\FD_inorganic\36049A4a.WPD

| Analyte | Concentration (mg/Kg) | | RPD | |
|----------|-----------------------|------|-----|--|
| | 12 | 14 | | |
| Arsenic | 9.3 | 10.2 | 9 | |
| Cadmium | 0.50 | 0.51 | 2 | |
| Chromium | 34.3 | 35.0 | 2 | |
| Copper | 39.0 | 41.5 | 6 | |
| Lead | 345 | 323 | 7 | |
| Mercury | 0.08 | 0.07 | 13 | |
| Silver | 0.6 | 0.6 | 0 | |
| Zinc | 160 | 171 | 7 | |

V:\FIELD DUPLICATES\FD_inorganic\36049A4a.WPD

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Jorgensen Forge Early Action Area

LDC Report Date: March 22, 2016

Parameters: Wet Chemistry

Validation Level: Stage 2B

Laboratory: Analytical Resources, Inc./
Materials Testing & Consulting, Inc.

Sample Delivery Group (SDG): AVZ9

| Sample Identification | Laboratory Sample Identification | Matrix | Collection Date |
|--------------------------|----------------------------------|----------|-----------------|
| JF-PDS-6-0-1ft-160209 | AVZ9A | Sediment | 02/09/16 |
| JF-PDS-6-1-2ft-160209 | AVZ9B | Sediment | 02/09/16 |
| JF-PDS-4-0-1ft-160210 | AVZ9C | Sediment | 02/10/16 |
| JF-PDS-4-1-2ft-160210 | AVZ9D | Sediment | 02/10/16 |
| JF-PDS-2-0-1ft-160210 | AVZ9E | Sediment | 02/10/16 |
| JF-PDS-2-1-2ft-160210 | AVZ9F | Sediment | 02/10/16 |
| JF-PDS-1-0-1ft-160210 | AVZ9G | Sediment | 02/10/16 |
| JF-PDS-1-1-2ft-160210 | AVZ9H | Sediment | 02/10/16 |
| JF-PDS-3-0-1ft-160211 | AVZ9I | Sediment | 02/11/16 |
| JF-PDS-3-1-2ft-160211 | AVZ9J | Sediment | 02/11/16 |
| JF-PDS-103-1-2ft-160211 | AVZ9K | Sediment | 02/11/16 |
| JF-PDS-5-0-1ft-160211 | AVZ9L | Sediment | 02/11/16 |
| JF-PDS-5-1-2ft-160211 | AVZ9M | Sediment | 02/11/16 |
| JF-PDS-105-0-1ft-160211 | AVZ9N | Sediment | 02/11/16 |
| JF-PDS-7-0-1ft-160212 | AVZ9O | Sediment | 02/12/16 |
| JF-PDS-7-1-2ft-160212 | AVZ9P | Sediment | 02/12/16 |
| JF-PDS-6-0-1ft-160209MS | AVZ9AMS | Sediment | 02/09/16 |
| JF-PDS-6-0-1ft-160209DUP | AVZ9ADUP | Sediment | 02/09/16 |
| JF-PDS-2-0-1ft-160210DUP | AVZ9EDUP | Sediment | 02/10/16 |
| JF-PDS-2-0-1ft-160210TRP | AVZ9ETRP | Sediment | 02/10/16 |
| JF-PDS-6-0-1ft-160209TRP | AVZ9ATRP | Sediment | 02/09/16 |

Introduction

This Data Validation Report (DVR) presents data validation findings and results for the associated samples listed on the cover page. Data validation was performed in accordance with Attachment 1 of the Quality Assurance Project Plan, Addendum No. 2 to the Operations, Monitoring, and Maintenance Plan for Jorgensen Forge Early Action Area (September 2015) and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines (CLPNFG) for Inorganic Superfund Data Review (October 2004). Where specific guidance was not available, the data has been evaluated in a conservative manner consistent with industry standards using professional experience.

The analyses were performed by the following methods:

Grain Size by Puget Sound Estuary Protocols (PSEP) Method

Total Organic Carbon by Plumb Method

Total Solids by Standard Method 2540G

Moisture Content by American Society for Testing and Materials (ASTM) D2216

All sample results were subjected to Stage 2B data validation, which comprises an evaluation of quality control (QC) summary results.

The following are definitions of the data qualifiers utilized during data validation:

- J (Estimated): The compound or analyte was analyzed for and positively identified by the laboratory; however the reported concentration is estimated due to non-conformances discovered during data validation.
- U (Non-detected): The compound or analyte was analyzed for and positively identified by the laboratory; however the compound or analyte should be considered non-detected at the reported concentration due to the presence of contaminants detected in the associated blank(s).
- UJ (Non-detected estimated): The compound or analyte was reported as not detected by the laboratory; however the reported quantitation/detection limit is estimated due to non-conformances discovered during data validation.
- R (Rejected): The sample results were rejected due to gross non-conformances discovered during data validation. Data qualified as rejected is not usable.
- NA (Not Applicable): The non-conformance discovered during data validation demonstrates a high bias, while the affected compound or analyte in the associated sample(s) was reported as not detected by the laboratory and did not warrant the qualification of the data.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

I. Sample Receipt and Technical Holding Times

All samples were received in good condition.

All technical holding time requirements were met.

II. Initial Calibration

All criteria for the initial calibration of each method were met.

III. Continuing Calibration

Continuing calibration frequency and analysis criteria were met for each method when applicable.

IV. Laboratory Blanks

Laboratory blanks were analyzed as required by the methods. No contaminants were found in the laboratory blanks.

V. Field Blanks

No field blanks were identified in this SDG.

VI. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) sample analysis was performed on an associated project sample. Percent recoveries (%R) were within QC limits.

VII. Triplicates Sample Analysis

Triplicate (TRP) sample analysis was performed on an associated project sample. Results were within QC limits.

VIII. Laboratory Control Samples/Standard Reference Materials

Laboratory control samples (LCS) were analyzed as required by the methods. Percent recoveries (%R) were within QC limits.

Standard reference materials (SRM) were analyzed as required by the methods. The results were within QC limits.

IX. Field Duplicates

Samples JF-PDS-3-1-2ft-160211 and JF-PDS-103-1-2ft-160211 and samples JF-PDS-5-0-1ft-160211 and JF-PDS-105-0-1ft-160211 were identified as field duplicates. No results were detected in any of the samples with the following exceptions:

| Analyte | Concentration (%) | | RPD |
|----------------------|-----------------------|-------------------------|-----|
| | JF-PDS-3-1-2ft-160211 | JF-PDS-103-1-2ft-160211 | |
| Total organic carbon | 0.118 | 0.168 | 35 |
| Total solids | 80.66 | 80.15 | 1 |

| Analyte | Concentration (%) | | RPD |
|----------------------|-----------------------|-------------------------|-----|
| | JF-PDS-5-0-1ft-160211 | JF-PDS-105-0-1ft-160211 | |
| Total organic carbon | 0.818 | 0.696 | 16 |
| Total solids | 74.29 | 74.35 | 0 |

| Sieve Size (microns) | Percent Finer Than the Indicated Size (%) | | RPD |
|----------------------|---|-------------------------|-----|
| | JF-PDS-3-1-2ft-160211 | JF-PDS-103-1-2ft-160211 | |
| #4 (4750) | 99.9 | 99.4 | 1 |
| #10 (2000) | 99.7 | 99.2 | 1 |
| #18 (1000) | 97.8 | 97.5 | 0 |
| #35 (500) | 79.9 | 79.3 | 1 |
| #60 (250) | 43.0 | 41.8 | 3 |
| #120 (125) | 20.2 | 19.5 | 4 |
| #230 (63) | 9.2 | 9.1 | 1 |
| (31.0) | 5.0 | 4.8 | 4 |
| (15.6) | 3.3 | 3.3 | 0 |
| (7.8) | 2.4 | 2.4 | 0 |
| (3.9) | 1.8 | 1.8 | 0 |
| (2.0) | 1.4 | 1.4 | 0 |
| (1.0) | 1.1 | 1.1 | 0 |

| Sieve Size (microns) | Percent Finer Than the Indicated Size (%) | | RPD |
|----------------------|---|-------------------------|-----|
| | JF-PDS-5-0-1ft-160211 | JF-PDS-105-0-1ft-160211 | |
| #4 (4750) | 99.6 | 95.9 | 4 |
| #10 (2000) | 98.4 | 94.7 | 4 |
| #18 (1000) | 96.6 | 92.7 | 4 |
| #35 (500) | 81.6 | 78.4 | 4 |
| #60 (250) | 40.6 | 39.0 | 4 |
| #120 (125) | 25.2 | 24.0 | 5 |
| #230 (63) | 18.9 | 17.9 | 5 |
| (31.0) | 15.0 | 14.6 | 3 |
| (15.6) | 10.2 | 10.0 | 2 |
| (7.8) | 4.5 | 5.2 | 14 |
| (3.9) | 2.8 | 3.0 | 7 |
| (2.0) | 2.1 | 2.2 | 5 |
| (1.0) | 1.4 | 1.5 | 7 |

X. Sample Result Verification

Raw data were not reviewed for Stage 2B validation.

XI. Overall Assessment of Data

The analysis was conducted within all specifications of the methods. No results were rejected in this SDG.

The quality control criteria reviewed were met and are considered acceptable. Based upon the data validation all results are considered valid and usable for all purposes.

Jorgensen Forge Early Action Area
Wet Chemistry - Data Qualification Summary - SDG AVZ9

No Sample Data Qualified in this SDG

Jorgensen Forge Early Action Area
Wet Chemistry - Laboratory Blank Data Qualification Summary - SDG AVZ9

No Sample Data Qualified in this SDG

LDC #: 36049A6 **VALIDATION COMPLETENESS WORKSHEET**

SDG #: AVZ9

Level III

Laboratory: Analytical Resources, Inc./Materials Testing & Consulting, Inc.

Date: 3-22-16

Page: 1 of 2

Reviewer: MG

2nd Reviewer: a

METHOD: (Analyte) Grain Size (PSEP Method), TOC (Plumb), Total Solids (SM 2540G)

Moisture Content (ASTM D2216)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

| | Validation Area | | Comments |
|-------|--|----|--------------------------|
| I. | Sample receipt/Technical holding times | A | |
| II | Initial calibration | A | |
| III. | Calibration verification | A | |
| IV | Laboratory Blanks | A | |
| V | Field blanks | N | |
| VI. | Matrix Spike/Matrix Spike Duplicates | A | MS |
| VII. | Duplicate sample analysis | A | TRIP |
| VIII. | Laboratory control samples | A | LCS/CRM |
| IX. | Field duplicates | SW | D = 10 + 11, D = 12 + 14 |
| X. | Sample result verification | N | |
| XI | Overall assessment of data | A | |

Note: A = Acceptable
N = Not provided/applicable
SW = See worksheet

ND = No compounds detected
R = Rinsate
FB = Field blank

D = Duplicate
TB = Trip blank
EB = Equipment blank

SB = Source blank
OTHER:

| | Client ID | Lab ID | Matrix | Date |
|----|-------------------------|---------|----------|----------|
| 1 | JF-PDS-6-0-1ft-160209 | AVZ9A | Sediment | 02/09/16 |
| 2 | JF-PDS-6-1-2ft-160209 | AVZ9B | Sediment | 02/09/16 |
| 3 | JF-PDS-4-0-1ft-160210 | AVZ9C | Sediment | 02/10/16 |
| 4 | JF-PDS-4-1-2ft-160210 | AVZ9D | Sediment | 02/10/16 |
| 5 | JF-PDS-2-0-1ft-160210 | AVZ9E | Sediment | 02/10/16 |
| 6 | JF-PDS-2-1-2ft-160210 | AVZ9F | Sediment | 02/10/16 |
| 7 | JF-PDS-1-0-1ft-160210 | AVZ9G | Sediment | 02/10/16 |
| 8 | JF-PDS-1-1-2ft-160210 | AVZ9H | Sediment | 02/10/16 |
| 9 | JF-PDS-3-0-1ft-160211 | AVZ9I | Sediment | 02/11/16 |
| 10 | JF-PDS-3-1-2ft-160211 | AVZ9J | Sediment | 02/11/16 |
| 11 | JF-PDS-103-1-2ft-160211 | AVZ9K | Sediment | 02/11/16 |
| 12 | JF-PDS-5-0-1ft-160211 | AVZ9L | Sediment | 02/11/16 |
| 13 | JF-PDS-5-1-2ft-160211 | AVZ9M | Sediment | 02/11/16 |
| 14 | JF-PDS-105-0-1ft-160211 | AVZ9N | Sediment | 02/11/16 |
| 15 | JF-PDS-7-0-1ft-160212 | AVZ9O | Sediment | 02/12/16 |
| 16 | JF-PDS-7-1-2ft-160212 | AVZ9P | Sediment | 02/12/16 |
| 17 | JF-PDS-6-0-1ft-160209MS | AVZ9AMS | Sediment | 02/09/16 |

LDC #: 36049A6 **VALIDATION COMPLETENESS WORKSHEET**


SDG #: AVZ9 Level III

Laboratory: Analytical Resources, Inc./Materials Testing & Consulting, Inc.

Date: 3-22-16

Page: 2 of 2

Reviewer: MG

2nd Reviewer: **METHOD:** (Analyte) Grain Size (PSEP Method), TOC (Plumb), Total Solids (SM 2540G)

| | Client ID | Lab ID | Matrix | Date |
|----|--------------------------|-----------|----------|----------|
| 18 | JF-PDS-6-0-1ft-160209DUP | AVZ9ADUP | Sediment | 02/09/16 |
| 19 | JF-PDS-2-0-1ft-160210DUP | AVZ9EDUP | Sediment | 02/10/16 |
| 20 | JF-PDS-2-0-1ft-160210TRP | AVZ9ETRP | Sediment | 02/10/16 |
| 21 | #1 TRP | AVZ9A TRP | Sediment | 2/9/16 |
| 22 | | | | |
| 23 | PBS1 | | | |
| 24 | PBS2 | | | |
| 25 | PBS3 | | | |

Notes:


LDC #: 36049A6

VALIDATION FINDINGS WORKSHEET

Sample Specific Analysis Reference

Page: 1 of 1

Reviewer: *MG*

2nd reviewer: 

All circled methods are applicable to each sample.

[illegible]

Comments: _____

LDC#: 36049A6**VALIDATION FINDINGS WORKSHEET****Field Duplicates**Page: 1 of 3Reviewer: MG2nd Reviewer: CVInorganics, Method See Cover

| Analyte | Concentration (%) | | RPD | |
|----------------------|-------------------|-------|-----|--|
| | 10 | 11 | | |
| Total Organic Carbon | 0.118 | 0.168 | 35 | |
| Total Solids | 80.66 | 80.15 | 1 | |

V:\FIELD DUPLICATES\FD_inorganic\36049A6a.WPD

| Analyte | Concentration (%) | | RPD | |
|----------------------|-------------------|-------|-----|--|
| | 12 | 14 | | |
| Total Organic Carbon | 0.818 | 0.696 | 16 | |
| Total Solids | 74.29 | 74.35 | 0 | |

V:\FIELD DUPLICATES\FD_inorganic\36049A6a.WPD

LDC# 36049A6

VALIDATION FINDINGS WORKSHEET **Field Duplicates**

Page: 2 of 3
 Reviewer: MG
 2nd Reviewer: *W*

Inorganics: Method See Cover

| Sieve Size (microns) | Percent Finer Than the Indicated Size (%) | | RPD | |
|----------------------|---|-------|-----|--|
| | 10 | 11 | | |
| 3/8" | 100.0 | 100.0 | 0 | |
| #4 (4750) | 99.9 | 99.4 | 1 | |
| #10 (2000) | 99.7 | 99.2 | 1 | |
| #18 (1000) | 97.8 | 97.5 | 0 | |
| #35 (500) | 79.9 | 79.3 | 1 | |
| #60 (250) | 43.0 | 41.8 | 3 | |
| #120 (125) | 20.2 | 19.5 | 4 | |
| #230 (63) | 9.2 | 9.1 | 1 | |
| 31.0 | 5.0 | 4.8 | 4 | |
| 15.6 | 3.3 | 3.3 | 0 | |
| 7.8 | 2.4 | 2.4 | 0 | |
| 3.9 | 1.8 | 1.8 | 0 | |
| 2.0 | 1.4 | 1.4 | 0 | |
| 1.0 | 1.1 | 1.1 | 0 | |

V:\FIELD DUPLICATES\FD_inorganic\36049A6b.wpd

| Sieve Size (microns) | Percent Finer Than the Indicated Size (%) | | RPD | |
|----------------------|---|-------|-----|--|
| | 12 | 14 | | |
| 3/8" | 100.0 | 100.0 | 0 | |
| #4 (4750) | 99.6 | 95.9 | 4 | |
| #10 (2000) | 98.4 | 94.7 | 4 | |

LDC# 36049A6**VALIDATION FINDINGS WORKSHEET**
Field DuplicatesPage: 3 of 3Reviewer: MG2nd Reviewer: W**Inorganics:** Method See Cover

| Sieve Size (microns) | Percent Finer Than the Indicated Size (%) | | RPD | |
|----------------------|---|------|-----|--|
| | 12 | 14 | | |
| #18 (1000) | 96.6 | 92.7 | 4 | |
| #35 (500) | 81.6 | 78.4 | 4 | |
| #60 (250) | 40.6 | 39.0 | 4 | |
| #120 (125) | 25.2 | 24.0 | 5 | |
| #230 (63) | 18.9 | 17.9 | 5 | |
| 31.0 | 15.0 | 14.6 | 3 | |
| 15.6 | 10.2 | 10.0 | 2 | |
| 7.8 | 4.5 | 5.2 | 14 | |
| 3.9 | 2.8 | 3.0 | 7 | |
| 2.0 | 2.1 | 2.2 | 5 | |
| 1.0 | 1.4 | 1.5 | 7 | |

V:\FIELD DUPLICATES\FD_inorganic\36049A6b.wpd

LDC #: 76049

EDD POPULATION COMPLETENESS WORKSHEET

Anchor

Date: 3-25-16Page: 1 of 12nd Reviewer: [Signature]The LDC job number listed above was entered by [Signature].

| | EDD Process | Y/N | Init | Comments/Action |
|-------|---|-----|-------------|-----------------|
| I. | EDD Completeness | - | [Signature] | |
| Ia. | - All methods present? | ✓ | [Signature] | |
| Ib. | - All samples present/match report? | ✓ | [Signature] | |
| Ic. | - All reported analytes present? | ✓ | [Signature] | |
| Id. | - 10 % verification of EDD? | ✓ | [Signature] | |
| II. | EDD Preparation/Entry | - | | |
| Ila. | - QC Level applied? (EPAS Stage2 or EPAS Stage4) | ✓ | [Signature] | |
| Ilb. | - Laboratory EMPC qualified results qualified (J with reason code 23)? | NA | [Signature] | |
| III. | Reasonableness Checks | - | | |
| IIla. | - Do all qualified ND results have ND qualifier (i.e. UJ)? | NA | [Signature] | |
| IIlb. | - Do all qualified detect results have detect qualifier (i.e. J)? | NA | [Signature] | |
| IIlc. | - If reason codes used, do all qualified results have reason code field populated, and vice versa? | ✓ | [Signature] | |
| IIId. | - Do blank concentrations in report match EDD, where data was qualified due to blank? | ✓ | [Signature] | |
| IIle. | - Were any results reported above calibration range? If so, were results qualified appropriately? | NA | [Signature] | |
| IIIf. | - Are all results marked reportable "Yes" unless rejected for overall assessment in the data validation report? | ✓ | [Signature] | |
| IIlg. | - Are there any lab "R" qualified data? / Are the entry columns blank for these results? | NA | [Signature] | |
| IIlh. | - Is the detect flag set to "N" for all "U" qualified blank results? | ✓ | [Signature] | |

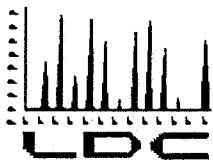
Notes: *see readme

The attached zipped file contains two files:

| <u>File</u> | <u>Format</u> | <u>Description</u> |
|-------------------------------------|---------------|--|
| 1) Readme_Jorgensen_032516.doc | MS Word 2003 | A "Readme" file (this document). |
| 2) LDC36049_AVZ9_VEDD_20160324.xlsx | MS Excel 2007 | A spreadsheet for the following SDG(s): AVZ9 36049A |

No discrepancies were observed between the hardcopy data packages and the electronic data deliverables during EDD population of validation qualifiers. A 100% verification of the EDD was not performed.

Please contact Pei Geng at (760) 827-1100 if you have any questions regarding this electronic data submittal.



LABORATORY DATA CONSULTANTS, INC.

2701 Loker Ave. West, Suite 220, Carlsbad, CA 92010 Bus: 760-827-1100 Fax: 760-827-1099

Anchor QEA, LLC
720 Olive Way, Suite 900
Seattle, WA 98101
ATTN: Ms. Cindy Fields

April 5, 2016

SUBJECT: Jorgensen Forge EAA, Data Validation

Dear Ms. Fields,

Enclosed is the final validation report for the fractions listed below. This SDG was received on March 31, 2016. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project #36124:

SDG #

Fraction

AXS8/T16-0435-T16-0437

Polychlorinated Biphenyls, Wet Chemsitry

The data validation was performed under Stage 2B guidelines. The analyses were validated using the following documents, as applicable to each method:

- Attachment 1 of the Quality Assurance Project Plan, Addendum No. 2 to the Operations, Monitoring, and Maintenance Plan for Jorgensen Forge Early Action Area, September 2015
- USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review, June 2008
- USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Method Data Review, October 1999
- USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Superfund Data Review, October 2004
- EPA SW 846, Third Edition, Test Methods for Evaluating Solid Waste, update 1, July 1992; update IIA, August 1993; update II, September 1994; update IIB, January 1995; update III, December 1996; update IIIA, April 1998; IIIB, November 2004; Update IV, February 2007

Please feel free to contact us if you have any questions.

Sincerely,

Christina Rink
Project Manager/Chemist

[illegible]

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Jorgensen Forge Early Action Area

LDC Report Date: April 1, 2016

Parameters: Polychlorinated Biphenyls

Validation Level: Stage 2B

Laboratory: Analytical Resources, Inc.

Sample Delivery Group (SDG): AXS8

| Sample Identification | Laboratory Sample Identification | Matrix | Collection Date |
|--------------------------|----------------------------------|----------|-----------------|
| JF-PDS-1-2-3ft-160210 | AXS8A | Sediment | 02/10/16 |
| JF-PDS-5-2-3ft-160211 | AXS8B | Sediment | 02/11/16 |
| JF-PDS-7-2-3ft-160212 | AXS8C | Sediment | 02/12/16 |
| JF-PDS-5-2-3ft-160211MS | AXS8BMS | Sediment | 02/11/16 |
| JF-PDS-5-2-3ft-160211MSD | AXS8BMDS | Sediment | 02/11/16 |

Introduction

This Data Validation Report (DVR) presents data validation findings and results for the associated samples listed on the cover page. Data validation was performed in accordance with Attachment 1 of the Quality Assurance Project Plan, Addendum No. 2 to the Operations, Monitoring, and Maintenance Plan for Jorgensen Forge Early Action Area (September 2015) and modified outlines of the USEPA Contract Laboratory Program National Functional Guidelines (CLPNFG) for Superfund Organic Methods Data Review (June 2008) and USEPA Contract Laboratory Program National Functional Guidelines (CLPNFG) for Superfund Organic Methods Data Review (October 1999). Where specific guidance was not available, the data has been evaluated in a conservative manner consistent with industry standards using professional experience.

The analyses were performed by the following method:

Polychlorinated Biphenyls (PCBs) by Environmental Protection Agency (EPA) SW 846 Method 8082

All sample results were subjected to Stage 2B data validation, which comprises an evaluation of quality control (QC) summary results.

The following are definitions of the data qualifiers utilized during data validation:

- J (Estimated): The compound or analyte was analyzed for and positively identified by the laboratory; however the reported concentration is estimated due to non-conformances discovered during data validation.
- U (Non-detected): The compound or analyte was analyzed for and positively identified by the laboratory; however the compound or analyte should be considered non-detected at the reported concentration due to the presence of contaminants detected in the associated blank(s).
- UJ (Non-detected estimated): The compound or analyte was reported as not detected by the laboratory; however the reported quantitation/detection limit is estimated due to non-conformances discovered during data validation.
- R (Rejected): The sample results were rejected due to gross non-conformances discovered during data validation. Data qualified as rejected is not usable.
- NA (Not Applicable): The non-conformance discovered during data validation demonstrates a high bias, while the affected compound or analyte in the associated sample(s) was reported as not detected by the laboratory and did not warrant the qualification of the data.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

I. Sample Receipt and Technical Holding Times

All samples were received in good condition and cooler temperatures upon receipt met validation criteria.

All technical holding time requirements were met.

II. Initial Calibration and Initial Calibration Verification

An initial calibration was performed as required by the method.

The percent relative standard deviations (%RSD) were less than or equal to 20.0% for all compounds.

The percent differences (%D) of the initial calibration verification (ICV) standard were less than or equal to 20.0% for all compounds.

III. Continuing Calibration

Continuing calibration was performed at required frequencies.

The percent differences (%D) were less than or equal to 20.0% for all compounds with the following exceptions:

| Date | Standard | Column | Compound | %D | Associated Samples | Affected Compound | Flag | A or P |
|----------|----------|--------|--------------|------|--|--|-----------------|--------|
| 03/26/16 | CCV | ZB-5 | Aroclor-1260 | 25.2 | JF-PDS-1-2-3ft-160210 JF-PDS-5-2-3ft-160211 | Aroclor-1242 Aroclor-1254 Aroclor-1260 | NA | - |
| 03/26/16 | CCV | ZB-5 | Aroclor-1260 | 25.2 | JF-PDS-7-2-3ft-160212 | Aroclor-1254 | J (all detects) | A |
| 03/26/16 | CCV | ZB-5 | Aroclor-1260 | 25.2 | JF-PDS-7-2-3ft-160212 | Aroclor-1242 Aroclor-1260 | NA | - |

IV. Laboratory Blanks

Laboratory blanks were analyzed as required by the method. No contaminants were found in the laboratory blanks.

V. Field Blanks

No field blanks were identified in this SDG.

VI. Surrogates/Internal Standards

Surrogates were added to all samples as required by the method. All surrogate recoveries (%R) were within QC limits.

All internal standard areas and retention times were within QC limits.

VII. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) and matrix spike duplicate (MSD) sample analysis was performed on an associated project sample. Percent recoveries (%R) were within QC limits. Relative percent differences (RPD) were within QC limits.

VIII. Laboratory Control Samples/Standard Reference Materials

Laboratory control samples (LCS) were analyzed as required by the method. Percent recoveries (%R) were within QC limits.

Standard reference materials (SRM) were analyzed as required by the method. The Aroclor-1260 result in the SRM was within the QC limits, however, the laboratory also reported Aroclor-1254.

IX. Field Duplicates

No field duplicates were identified in this SDG.

X. Compound Quantitation

Raw data were not reviewed for Stage 2B validation.

XI. Target Compound Identification

Raw data were not reviewed for Stage 2B validation.

XII. Overall Assessment of Data

The analysis was conducted within all specifications of the method. No results were rejected in this SDG.

Due to continuing calibration %D, data were qualified as estimated in one sample.

The quality control criteria reviewed, other than those discussed above, were met and are considered acceptable. Sample results that were found to be estimated (J) are usable for limited purposes only. Based upon the data validation all other results are considered valid and usable for all purposes.

Jorgensen Forge Early Action Area
Polychlorinated Biphenyls - Data Qualification Summary - SDG AXS8

| Sample | Compound | Flag | A or P | Reason |
|-----------------------|--------------|-----------------|--------|-----------------------------|
| JF-PDS-7-2-3ft-160212 | Aroclor-1254 | J (all detects) | A | Continuing calibration (%D) |

Jorgensen Forge Early Action Area
Polychlorinated Biphenyls - Laboratory Blank Data Qualification Summary - SDG AXS8

No Sample Data Qualified in this SDG

LDC #: 36124A3b

VALIDATION COMPLETENESS WORKSHEET

SDG #: AXS8

Stage 2B

Laboratory: Analytical Resources, Inc.

Date: 4/1/16

Page: 1 of 1

Reviewer: F7

2nd Reviewer: A

METHOD: GC Polychlorinated Biphenyls (EPA SW846 Method 8082)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

| | Validation Area | | Comments |
|-------|--|-----|-----------------|
| I. | Sample receipt/Technical holding times | A/A | |
| II. | Initial calibration/ICV | A/A | ICAL / ICV ≤ 20 |
| III. | Continuing calibration | SW | SCV ≤ 20 |
| IV. | Laboratory Blanks | A | |
| V. | Field blanks | N | |
| VI. | Surrogate spikes /15 | A | |
| VII. | Matrix spike/Matrix spike duplicates | A | |
| VIII. | Laboratory control samples / SRM | A/A | LCS, SRM |
| IX. | Field duplicates | N | |
| X. | Compound quantitation/RL/LOQ/LODs | N | |
| XI. | Target compound identification | N | |
| XII. | Overall assessment of data | A | |

Note: A = Acceptable
N = Not provided/applicable
SW = See worksheet

ND = No compounds detected
R = Rinsate
FB = Field blank

D = Duplicate
TB = Trip blank
EB = Equipment blank

SB=Source blank
OTHER:

| | Client ID | Lab ID | Matrix | Date |
|----|--------------------------|----------|----------|----------|
| 1 | JF-PDS-1-2-3ft-160210 | AXS8A | Sediment | 02/10/16 |
| 2 | JF-PDS-5-2-3ft-160211 | AXS8B | Sediment | 02/11/16 |
| 3 | JF-PDS-7-2-3ft-160212 | AXS8C | Sediment | 02/12/16 |
| 4 | JF-PDS-5-2-3ft-160211MS | AXS8BMS | Sediment | 02/11/16 |
| 5 | JF-PDS-5-2-3ft-160211MSD | AXS8BMSD | Sediment | 02/11/16 |
| 6 | | | | |
| 7 | | | | |
| 8 | | | | |
| 9 | | | | |
| 10 | | | | |
| 11 | | | | |
| 12 | | | | |

Notes:

| | | | | | |
|-------------|--|--|--|--|--|
| MB - 032316 | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

VALIDATION FINDINGS WORKSHEET

METHOD: Pesticide/PCBs (EPA SW 846 Method 8081/8082)

| | | | | |
|-----------------------|-----------------------|--------------------|-----------------------|---------------------------|
| A. alpha-BHC | I. Dieldrin | Q. Endrin ketone | Y. Aroclor-1242 | GG. Chlordane |
| B. beta-BHC | J. 4,4'-DDE | R. Endrin aldehyde | Z. Aroclor-1248 ✓ | HH. Chlordane (Technical) |
| C. delta-BHC | K. Endrin | S. alpha-Chlordane | AA. Aroclor-1254 | II. Aroclor 1262 |
| D. gamma-BHC | L. Endosulfan II | T. gamma-Chlordane | BB. Aroclor-1260 | JJ. Aroclor 1268 |
| E. Heptachlor | M. 4,4'-DDD | U. Toxaphene | CC. 2,4'-DDD | KK. Oxychlordane |
| F. Aldrin | N. Endosulfan sulfate | V. Aroclor-1016 | DD. 2,4'-DDE | LL. trans-Nonachlor |
| G. Heptachlor epoxide | O. 4,4'-DDT | W. Aroclor-1221 | EE. 2,4'-DDT | MM. cis-Nonachlor |
| H. Endosulfan I | P. Methoxychlor | X. Aroclor-1232 | FF. Hexachlorobenzene | NN. |

Notes: _____

LDC #: 36124 A3 b

VALIDATION FINDINGS WORKSHEET

Continuing Calibration

Page: 1 of
Reviewer: FT
2nd Reviewer: 02

METHOD: GC HPLC

Please see qualifications below for all questions answered "N". Not applicable questions are identified as "N/A".

What type of continuing calibration calculation was performed? ___%D or ___%R

Y N N/A Were continuing calibration standards analyzed at the required frequencies?

| | |
|-----------|---|
| Y (N) N/A | Did the continuing calibration standards meet the %D / %R validation criteria of $\leq 20.0\%$ / 80-120%? |
|-----------|---|

Level IV Only

Y N N/A Were the retention times for all calibrated compounds within their respective acceptance windows?

[illegible]

Laboratory Data Consultants, Inc. Data Validation Report

Project/Site Name: Jorgensen Forge Early Action Area

LDC Report Date: April 1, 2016

Parameters: Wet Chemistry

Validation Level: Stage 2B

Laboratory: Analytical Resources, Inc./
Materials Testing & Consulting, Inc.

Sample Delivery Group (SDG): AXS8

| Sample Identification | Laboratory Sample Identification | Matrix | Collection Date |
|------------------------------|---|---------------|------------------------|
| JF-PDS-1-2-3ft-160210 | AXS8A | Sediment | 02/10/16 |
| JF-PDS-5-2-3ft-160211 | AXS8B | Sediment | 02/11/16 |
| JF-PDS-7-2-3ft-160212 | AXS8C | Sediment | 02/12/16 |
| JF-PDS-1-2-3ft-160210MS | AXS8AMS | Sediment | 02/10/16 |
| JF-PDS-1-2-3ft-160210DUP | AXS8ADUP | Sediment | 02/10/16 |
| JF-PDS-5-2-3ft-160211DUP | AXS8BDUP | Sediment | 02/11/16 |
| JF-PDS-5-2-3ft-160211TRP | AXS8BTRP | Sediment | 02/11/16 |
| JF-PDS-1-2-3ft-160210TRP | AXS8ATRP | Sediment | 02/10/16 |

Introduction

This Data Validation Report (DVR) presents data validation findings and results for the associated samples listed on the cover page. Data validation was performed in accordance with Attachment 1 of the Quality Assurance Project Plan, Addendum No. 2 to the Operations, Monitoring, and Maintenance Plan for Jorgensen Forge Early Action Area (September 2015) and a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines (CLPNFG) for Inorganic Superfund Data Review (October 2004). Where specific guidance was not available, the data has been evaluated in a conservative manner consistent with industry standards using professional experience.

The analyses were performed by the following methods:

Grain Size by Puget Sound Estuary Protocols (PSEP) Method
Total Organic Carbon by Plumb Method
Total Solids by Standard Method 2540G

All sample results were subjected to Stage 2B data validation, which comprises an evaluation of quality control (QC) summary results.

The following are definitions of the data qualifiers utilized during data validation:

- J (Estimated): The compound or analyte was analyzed for and positively identified by the laboratory; however the reported concentration is estimated due to non-conformances discovered during data validation.
- U (Non-detected): The compound or analyte was analyzed for and positively identified by the laboratory; however the compound or analyte should be considered non-detected at the reported concentration due to the presence of contaminants detected in the associated blank(s).
- UJ (Non-detected estimated): The compound or analyte was reported as not detected by the laboratory; however the reported quantitation/detection limit is estimated due to non-conformances discovered during data validation.
- R (Rejected): The sample results were rejected due to gross non-conformances discovered during data validation. Data qualified as rejected is not usable.
- NA (Not Applicable): The non-conformance discovered during data validation demonstrates a high bias, while the affected compound or analyte in the associated sample(s) was reported as not detected by the laboratory and did not warrant the qualification of the data.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified as P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

I. Sample Receipt and Technical Holding Times

All samples were received in good condition.

All technical holding time requirements were met.

II. Initial Calibration

All criteria for the initial calibration of each method were met.

III. Continuing Calibration

Continuing calibration frequency and analysis criteria were met for each method when applicable.

IV. Laboratory Blanks

Laboratory blanks were analyzed as required by the methods. No contaminants were found in the laboratory blanks.

V. Field Blanks

No field blanks were identified in this SDG.

VI. Matrix Spike/Matrix Spike Duplicates

Matrix spike (MS) sample analysis was performed on an associated project sample. Percent recoveries (%R) were within QC limits.

VII. Triplicates Sample Analysis

Triplicate (TRP) sample analysis was performed on an associated project sample. Results were within QC limits.

VIII. Laboratory Control Samples/Standard Reference Materials

Laboratory control samples (LCS) were analyzed as required by the methods. Percent recoveries (%R) were within QC limits.

Standard reference materials (SRM) were analyzed as required by the methods. The results were within QC limits.

IX. Field Duplicates

No field duplicates were identified in this SDG.

X. Sample Result Verification

Raw data were not reviewed for Stage 2B validation.

XI. Overall Assessment of Data

The analysis was conducted within all specifications of the methods. No results were rejected in this SDG.

The quality control criteria reviewed were met and are considered acceptable. Based upon the data validation all results are considered valid and usable for all purposes.

**Jorgensen Forge Early Action Area
Wet Chemistry - Data Qualification Summary - SDG AXS8**

No Sample Data Qualified in this SDG

**Jorgensen Forge Early Action Area
Wet Chemistry - Laboratory Blank Data Qualification Summary - SDG AXS8**

No Sample Data Qualified in this SDG

LDC #: 36124A6 **VALIDATION COMPLETENESS WORKSHEET**SDG #: ~~AXS8/T16-0435-T16-0437~~ Level IIILaboratory: Analytical Resources, Inc./Materials Testing & Consulting, Inc.Date: 3-31-16Page: 1 of 1Reviewer: MG2nd Reviewer: **METHOD:** (Analyte) Grain Size (PSEP Method), TOC (Plumb), Total Solids (SM 2540G)

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

| | Validation Area | | Comments |
|-------|--|---|----------|
| I. | Sample receipt/Technical holding times | A | |
| II | Initial calibration | A | |
| III. | Calibration verification | A | |
| IV | Laboratory Blanks | A | |
| V | Field blanks | N | |
| VI. | Matrix Spike/Matrix Spike Duplicates | A | MS |
| VII. | Duplicate sample analysis | A | TRIP |
| VIII. | Laboratory control samples | A | LCS/SRM |
| IX. | Field duplicates | N | |
| X. | Sample result verification | N | |
| XI | Overall assessment of data | A | |

Note: A = Acceptable
N = Not provided/applicable
SW = See worksheet

ND = No compounds detected
R = Rinsate
FB = Field blank

D = Duplicate
TB = Trip blank
EB = Equipment blank

SB=Source blank
OTHER:

| | Client ID | Lab ID | Matrix | Date |
|----|--------------------------|-----------|----------|----------|
| 1 | JF-PDS-1-2-3ft-160210 | AXS8A | Sediment | 02/10/16 |
| 2 | JF-PDS-5-2-3ft-160211 | AXS8B | Sediment | 02/11/16 |
| 3 | JF-PDS-7-2-3ft-160212 | AXS8C | Sediment | 02/12/16 |
| 4 | JF-PDS-1-2-3ft-160210MS | AXS8AMS | Sediment | 02/10/16 |
| 5 | JF-PDS-1-2-3ft-160210DUP | AXS8ADUP | Sediment | 02/10/16 |
| 6 | JF-PDS-5-2-3ft-160211DUP | AXS8BDUP | Sediment | 02/11/16 |
| 7 | JF-PDS-5-2-3ft-160211TRP | AXS8BTRP | Sediment | 02/11/16 |
| 8 | JF-PDS-1-2-3ft-160210TRP | AXS8ATRIP | sediment | 2/10/16 |
| 9 | | | | |
| 10 | | | | |
| 11 | | | | |
| 12 | | | | |
| 13 | | | | |
| 14 | PBS | | | |

Notes: _____

LDC #: 36174A6

VALIDATION FINDINGS WORKSHEET

Sample Specific Analysis Reference

Page: 1 of 1
Reviewer: MG
2nd reviewer: a

All circled methods are applicable to each sample.

[illegible]

Comments:

LDC #: 36124**EDD POPULATION COMPLETENESS WORKSHEET**

Anchor

Date: 4.4.16Page: 1 of 12nd Reviewer: [Signature]The LDC job number listed above was entered by [Signature].

| | EDD Process | Y/N | Init | Comments/Action |
|-------|---|-----|------|-----------------|
| I. | EDD Completeness | - | | |
| Ia. | - All methods present? | ✓ | U | |
| Ib. | - All samples present/match report? | ✓ | U | |
| Ic. | - All reported analytes present? | ✓ | U | |
| Id. | -10% verification of EDD? | ✓ | U | |
| | | | | |
| II. | EDD Preparation/Entry | - | | |
| Ila. | - QC Level applied? (EPAStage2B or EPASStage4) | ✓ | U | |
| Ilb. | - Laboratory EMPC qualified results qualified (J with reason code 23)? | NA | U | |
| | | | | |
| III. | Reasonableness Checks | - | | |
| IIla. | - Do all qualified ND results have ND qualifier (i.e. UJ)? | NA | U | |
| IIlb. | - Do all qualified detect results have detect qualifier (i.e. J)? | ✓ | U | |
| IIlc. | - If reason codes used, do all qualified results have reason code field populated, and vice versa? | ✓ | U | |
| IIId. | - Do blank concentrations in report match EDD, where data was qualified due to blank? | NA | U | |
| IIle. | - Were any results reported above calibration range? If so, were results qualified appropriately? | NA | U | |
| IIIf. | - Are all results marked reportable "Yes" unless rejected for overall assessment in the data validation report? | ✓ | U | |
| IIIg. | -Are there any lab "R" qualified data? / Are the entry columns blank for these results? | NA | U | |
| IIIH. | - Is the detect flag set to "N" for all "U" qualified blank results? | NA | U | |

Notes: *see readme

The attached zipped file contains two files:

| <u>File</u> | <u>Format</u> | <u>Description</u> |
|-------------------------------------|---------------|--|
| 1) Readme_Jorgensen_040416.doc | MS Word 2003 | A "Readme" file (this document). |
| 2) LDC36124_AXS8_VEDD_20160401.xlsx | MS Excel 2007 | A spreadsheet for the following SDG(s): AXS8/T16-0435-T16-0437 36124A |

No discrepancies were observed between the hardcopy data packages and the electronic data deliverables during EDD population of validation qualifiers. A 100% verification of the EDD was not performed.

Please contact Christina Rink at (760) 827-1100 if you have any questions regarding this electronic data submittal.